

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA, ON BEHALF	)
OF ITS AGENCY, SECRETARY OF U.S.	)
DEPARTMENT OF HOUSING AND URBAN	)
DEVELOPMENT,	) Case No.: 15-cv-826
	)
Plaintiff,	)
	) Judge: Harry D. Leinenweber
v.	)
WILLIAM P, BUTCHER AS SPECIAL	)
REPRESENTATIVE OF THE ESTATE OF	)
CLEO SMITH; WELLS FARGO BANK, N.A.;	) Magistrate Judge: Young B. Kim
CAPITAL ONE BANK (USA) N.A., UNKNOWN	)
HEIRS AND LEGATEES OF CLEO SMITH;	)
UNKNOWN OWNERS AND NON-RECORD	)
CLAIMANTS,	)

**MOTION FOR ENTRY OF JUDGMENT OF FORECLOSURE**

NOW COMES, Plaintiff, UNITED STATES OF AMERICA, ON BEHALF OF ITS  
AGENCY, SECRETARY OF U.S. DEPARTMENT OF HOUSING AND URBAN  
DEVELOPMENT, by and through its attorneys, Potestivo & Associates, P.C., and moves  
this Honorable Court, for the Entry of a Judgment of Foreclosure.

In support, attached please find Plaintiff's Affidavit of Prove-Up. (See Exhibit "1",  
Affidavit).

Respectfully submitted,

ZACHARY T. FARDON

United States Attorney

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**CERTIFICATE OF SERVICE**

I, Caleb J. Halberg , certify that a true and correct copy of the foregoing **Motion for Entry of Judgment of Foreclosure** was served upon counsel of record, if any, through operation of the Court's Case Management/Electronic Case Files system on May 21, 2015, and on the following non-ECF filers by first class mailing on May 22, 2015:

William P. Butcher Special Representative  
of the Estate of Cleo Smith  
2044 Ridge Road  
Homewood, IL 60430

Wells Fargo Bank, N.A.  
503 S. Pierre Street  
Pierre, SD 57501

Capital One Bank (USA), N.A.  
1111 E Main Street, Suite 1600  
Richmond, VA 23219

Unknown Heirs and Legatees of Cleo Smith  
1001 W. 102<sup>nd</sup> Street  
Chicago, IL 60643

Unknown Owners and Non-Record Claimants  
1001 W. 102<sup>nd</sup> Street  
Chicago, IL 60643

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